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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CHELSEA L. DAVIS**  
*Plaintiff*

**V.**

**MCKOOL SMITH P.C. et al**  
*Defendants*

**CASE NO. 3:14-cv-3962-P**

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**OBJECTIONS TO JUDGE DAVID C. GODBEY**

Judge David C. Godbey appears to have been appointed to a District Grievance Committee allegedly for the State Bar of Texas, but actually organized by McKool Smith P.C. and attorney for Leslie Ware, which is investigating Chelsea Davis based on McKool Smith P.C.'s filing of a grievance against Chelsea Davis. Accordingly, he has a conflict of interest, is biased and is not fit to preside over any matter involving facts related to Chelsea Davis, McKool Smith P.C. and Leslie Ware. Under the Texas Rules of Disciplinary Procedure, he is not permitted to preside over any such matter and must recuse himself.

To the extent Judge David C. Godbey has been appointed as a district committee member, I have objected to Judge David C. Godbey's failure to swear under oath to the acceptance of a committee appointment, to which he is required to swear under Rule 2.05 of the Texas Rules of Disciplinary Procedure, as follows:

"I do solemnly swear (or affirm) that I will faithfully execute my duties as a member of the District grievance committee, as required by the Texas Rules of Disciplinary Procedure, and will, to the best of my ability, preserve, protect, and defend the Constitution and laws of the United States and of the

State of Texas. I further solemnly swear (or affirm) that I will keep secret all such matters and things as shall come to my knowledge as a member of the grievance committee arising from or in connection with each Disciplinary Action and Disciplinary Proceeding, unless permitted to disclose the same in accordance with the Rules of Disciplinary Procedure, or unless ordered to do so in the course of a judicial proceeding or a proceeding before the Board of Disciplinary Appeals. I further solemnly swear (or affirm) that I have neither directly nor indirectly paid, offered, or promised to pay, contributed any money or valuable thing, or promised any public or private office to secure my appointment. So help me God.”

Further, I have objected to Judge David C. Godbey presiding over any civil action on the merits in which I am a party due to his conflict of interest as a result of his participation in this and any other grievance matter, including sealed and undercover investigations involving Chelsea Davis, McKool Smith P.C. and Leslie Ware pursuant to the Texas Rules of Disciplinary Procedure.

Dated: Dec. 8, 2014

Respectfully,

/s/Chelsea L. Davis  
Chelsea L. Davis, *pro-se*  
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### **CERTIFICATE OF SERVICE**

On this day, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically by email or, as a pro-se

party, on the date it is electronically docketed in the court's CM/ECF system, as authorized by the Federal Rule of Civil Procedure 5(b)(2) and the Local Rules of this Court,

Dated: Dec. 8, 2014

/s/Chelsea L. Davis  
Chelsea L. Davis, *pro-se*